

JUL-30-97 WED 6:48

REGIONAL DIRECTOR

FAX NO. 504 736 2432

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JUL 29 '97 02:24PM NIPPON OIL EXPL USA

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**NIPPON OIL EXPLORATION U.S.A. LIMITED**  
 5847 San Felipe, Suite 2800, Houston, Texas 77057  
 Main (713) 265-7400 • Telecopy (713) 978-7800



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 - FAX to Kum Kum  
 - RE 18

**TELECOPY TRANSMITTAL**

DATE: 07 / 29 / 97

REFERENCE NUMBER: H97 07-160

TO: Chris Oynes - Regional Director  
 Minerals Management Service

FAX NO.: ( 504 ) 736 - 2432

FROM: Robert J. Ardall, Executive Vice-President

NO. OF PAGES: 2  
 (including this sheet)

SUBJECT: MMS Geophysical and Geological (G&amp;G) Rulemaking

On February 11, 1997, MMS proposed to amend the rules dealing with the collection, processing and disposition of G&G data. After reviewing the proposed rules changes, Nippon respectfully objects to the proposed changes which appear to place an inappropriate burden upon smaller companies, such as ours, in providing certain information to the MMS.

For a complete discussion of the objectionable aspects of the proposed changes, I refer you to the statement prepared and sent to you by the Independent Petroleum Association of America (IPAA), which statement we strongly support and endorse.

In addition, we are a relatively small company and do not have the facilities or personnel which would be necessary in the event we become required to keep track everytime seismic data is processed and reprocessed. Furthermore, we have no excess workstations or geophysicists available in the event MMS

GSA/Frm110

OPTIONAL FORM 99 (7-90)

**FAX TRANSMITTAL**

# of pages = 2

1/24/96

To: Kum Kum Ray  
 Dept./Agency

From: Chris Oynes  
 Phone # 504 736-2589

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NSN 7540 01-317-7368


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GENERAL SERVICES ADMINISTRATION

personnel wanted to visit our office to review such data.

In short, we do not believe the MMS has analyzed the possible impacts the proposed changes would have on small businesses such as ours. We hope you will seriously consider our concerns as well as those conveyed to you by IPAA.

Sincerely,

  
Robert J. Ardell  
Executive Vice President